

<b>Vermont Psychiatric Care Hospital Policy and Procedure</b>		
<b>COVID - Vaccine Mandate Policy</b>		
Effective: August 2022	Revised: April 2023	Due to Review: April 2025

## **POLICY**

The Vermont Psychiatric Care Hospital (VPCH) will abide by the Centers for Medicare and Medicaid Services (CMS) Interim Final Rule (IFC) 86 FR 6155, effective November 5, 2021. The IFC incorporates the new provisions requiring staff vaccination into the existing federal regulatory Conditions of Participation and State of Vermont hospital licensure.

## **DEFINITIONS:**

Fully Vaccinated: The IFC defaults to the Centers for Disease Control and Prevention (CDC) current definition of *fully vaccinated*. Because the science and clinical recommendations around additional doses and booster may continue to evolve, VPCH policy and procedure will also utilize current CDC guidelines to define the terms of *full vaccination*.

Personnel: The (IFC) 86 FR 6155 vaccine requirements applies to any individual who provides any care, treatment, or other services for the facility and/or the individuals it serves, regardless of clinical responsibility or contact with hospitalized persons including, but not limited to:

- Facility Employees
- Licensed Practitioners
- Students, trainees, volunteers, etc.
- Any individuals who provide care, treatment, or other services for the facility and/or the individuals it serves, under contract or by any other arrangement.

Hereafter, individuals meeting the above listed criteria are referred to as *personnel*.

## **PROCEDURE**

### Proof of Vaccination

Regardless of where or when vaccination was received, personnel must provide VPCH with proof of vaccination. Acceptable forms of vaccination proof include:

- CDC COVID-19 Vaccination Card or legible photo of the card.
- Documentation of vaccination from a health care provider or electronic health record.
- State immunization information system record.

Personnel new to the facility must provide proof of full vaccination against COVID-19 prior to starting employment at VPCH. Proof must be submitted to Infection Prevention RN, or their designee.

The applicability of less common vaccination pathways, such as for personnel who have been vaccinated during participation in a clinical trial, combining doses from different manufacturers, or who have been vaccinated in countries other than the United States, will be reviewed on a case-by-case basis as per applicable IFC interpretive guidance.

The vaccine requirement does NOT apply to the following:

- Individuals who exclusively provide telehealth or telemedicine services and who do not have any direct contact with hospitalized individuals and other personnel listed above.
- Outside contractors or individuals who provide specific, yet infrequent services to the facility, but have very limited interaction with staff and/or hospitalized individuals. This may include equipment repair contractors, medical equipment inspectors, external contractors who provide plumbing, construction, renovation or HVAC services, delivery personnel, and linen service providers, etc.

### Vaccine Administration

COVID-19 vaccines are widely available in the community through vaccination clinics, local pharmacies, and primary care provider offices. Personnel shall utilize these pathways to obtain vaccination. VPCH may offer COVID-19 vaccination to personnel at various times as part of an effort to increase access to additional doses or booster doses as recommended by the CDC.

### Temporary Medical Accommodations

A request to temporarily delay vaccination must be supported by a licensed healthcare provider's opinion that vaccination must be temporarily delayed, as recommended by the CDC, due to clinical precautions and considerations. If it is determined that a COVID-19 vaccination must be temporarily delayed, VPCH leadership will identify accommodations based on vaccination status.

Personnel requesting this type of accommodation will follow the same process for a medical exemption. Staff with an approved accommodation will be allowed to work for the duration of the accommodation but must obtain the first dose of a two-dose vaccination or a single-dose vaccine by the date indicated by the provider.

### Requesting Lawful Exemption

Exemptions from COVID-19 vaccination are available to personnel who cannot be vaccinated due to a medical condition for which vaccination is contraindicated, or because vaccination is inconsistent with their sincerely held religious beliefs. Prospective personnel must complete the exemption process prior to starting employment. Personnel requesting a medical or religious exemption must provide all required information to VPCH.

Medical exemption requests must include supporting documentation that is signed and dated by a licensed practitioner who is not the individual requesting the exemption, and who is acting within their respective scope of practice in accordance with applicable state and federal laws. Documentation must include information regarding which vaccine(s) are clinically contraindicated and the clinical reasons for the contraindications; the authorizing practitioner must also provide written statement recommending the staff member be exempt from the vaccination requirement based on recognized clinical contraindications.

If it is determined that an individual cannot be vaccinated against COVID-19 due to a medical condition or a sincere religious belief, VPCH will consider whether it is possible to reasonably and safely accommodate personnel with an unvaccinated status.

VPCH will maintain documentation related to proof of vaccination, religious exemptions, or medical exemptions, in a secure location. This documentation will be made available, upon request, to State and Federal regulatory surveyors.

#### Contingency Plans for Personnel with Approved Vaccine Exemption

For personnel with an approved medical or religious exemption, implementation of infection control measures consistent with state or federal authorities may be considered as they pertain to potential accommodations. COVID-19 mitigation measures may include but are not limited to: COVID-19 testing requirements, remote work options, mandatory Personal Protective Equipment use such as medical facemasks and/or fit tested respirator. Mitigation measures will be outlined in the exemption memo and are subject to change as evidence and recommendation from leading public health authorities (CDC, the Vermont Department of Health) change.

#### Provision of Vaccine/Booster

Personnel who have obtained an additional dose or booster dose(s) of a COVID-19 vaccine shall, at a minimum, submit written notification or proof of additional/booster dose(s) to Infection Preventionist, or their designee. Acceptable forms of documentation include:

- CDC COVID-19 Vaccination Card or legible photo of the card.
- Documentation of vaccination from a health care provider or electronic health record.
- State immunization information system record.
- Signed VPCH Vaccine attestation form.

VPCH will maintain documentation of booster dose(s) in a secure location. This documentation will be made available, upon request, to State and Federal regulatory surveyors.

#### Failure to Vaccinate

Employees without a medical or religious exemption who fail to meet the vaccine requirements detailed above will no longer be qualified for employment at VPCH.

#### **References:**

<https://www.cms.gov/files/document/qs0-23-02-all.pdf>

<b>Approved by</b>	<b>Signature</b>	<b>Date</b>
Emily Hawes Commissioner Vermont Department of Mental Health	 <p>DocuSigned by: Emily Hawes C50275615A62462...</p>	4/4/2023